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BY E-FILING

The Honorable Leonard P. Stark
U.S. Court of Appeals for the Federal Circuit
717 Madison Place, NW
Washington, D.C. 20439

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*
No. 1:17-mc-00151-LPS

Dear Judge Stark:

I write on behalf of CITGO Petroleum Corporation (“CITGO”), PDV Holding, Inc. (“PDVH” and together with CITGO, the “CITGO Parties”), the Bolivarian Republic of Venezuela (the “Republic”), and Petróleos de Venezuela, S.A. (“PDVSA”) regarding the Court’s Orders of October 2, 2024 (D.I. 1340) and October 9, 2024 (D.I. 1358) setting and modifying a schedule for the Special Master to submit “his position on whether (and, if so, how) to conduct proceedings regarding a determination as to whether PDVH is the alter ego of PDVSA” in connection with the Court’s consideration of the Special Master’s injunction motion.

The Special Master’s proposal in his October 18, 2024 letter that “the Court should conduct proceedings to determine whether PDVH and/or any of its subsidiaries are alter egos of PDVSA and/or the Republic” and to consolidate and expedite the ConocoPhillips, OI European Group, and other future-filed alter ego actions (D.I. 1374 at 2) implicates the interests of the Republic, PDVSA, and the CITGO Parties and requires a response from them.

Accordingly, the Republic, PDVSA, and the CITGO Parties intend to submit a letter stating their position on the Special Master’s filing by Friday, November 1, 2024, the same date by which the plaintiffs in the alter ego actions are to provide their positions.

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Respectfully submitted,

/s/ Alexandra M. Cumings

Alexandra M. Cumings (#6146)

cc: All Counsel of Record